

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

BLOCKFI INC., *et al.*,
Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)
(Jointly Administered)

Hearing Date and Time:

September 21, 2023 at 10:00 a.m. (ET)

**CERTIFICATION OF DAVID E. SKLAR, ESQ. IN SUPPORT OF
MOTION OF ZACHARY PRINCE AND FLORI MARQUEZ FOR AN
ORDER LIFTING THE AUTOMATIC STAY, TO THE EXTENT
APPLICABLE, TO ALLOW INSURED PERSONS TO ACCESS PRIMARY
DIRECTORS AND OFFICERS INSURANCE POLICY FOR DEFENSE COSTS**

I, **DAVID E. SKLAR, ESQ.**, hereby declare as follows:

1. I am an Associate of the law firm Porzio, Bromberg & Newman, P.C., counsel to Zachary Prince and Flori Marquez (the "Movants") in the above-captioned action. I make this declaration based upon my personal knowledge and review of the relevant documents

2. I submit this Certification in support of the *Motion of Zachary Prince and Flori Marquez for an Order Lifting the Automatic Stay, to the Extent Applicable, to Allow Insured Persons to Access Primary Directors and Officers Insurance Policy for Defense Costs* (the "Stay Relief Motion"), pursuant to 11 U.S.C. § 362(d)(2).

3. We received the Relm D&O Policy from the Debtors, and we believe it contains confidential proprietary information that should not be filed on a public docket, and out of an abundance of caution we move to file the Relm D&O Policy as an exhibit under seal pursuant to the *Confidentiality Stipulation and Protective Order* [Docket No. 498].

4. Attached hereto as **Exhibit A** is a true and accurate copy of the Relm D&O Policy.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

I certify, under penalty of perjury, that the foregoing statements made by me are true.

Dated: August 22, 2023
Morristown, NJ

By: /s/ David E. Sklar
David E. Sklar

EXHIBIT A

FILED UNDER SEAL